

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

ROSY GIRON DE REYES, *et al.*,

Plaintiffs,

v.

WAPLES MOBILE HOME PARK
LIMITED PARTNERSHIP, *et al.*,

Defendants.

Civil No.: 1:16cv563-LO-TCB

NOTICE OF FILING OF DEFENDANTS' MOTION TO SEAL

PLEASE TAKE NOTICE that pursuant to Local Civil Rule 5, Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A. J. Dwoskin & Associates, Inc. (collectively "Defendants"), by counsel and in accordance with the Stipulated Protective Order entered in this matter on August 18, 2016 (Dkt. 45) hereby gives public notice that a Motion to Seal was filed on June 4, 2021 to respectfully move this Court for entry of an Order directing that (1) documents attached as exhibits to Defendants' memorandum in opposition to Plaintiffs' Motions *in Limine* filed on June 4, 2021 (Dkt. 379); and (2) portions of Defendants' memorandum in opposition to Plaintiffs' Motions *in Limine* filed on June 4, 2021 (Dkt. 379) be sealed. Defendants' Motion to Seal respectfully moves the Court to seal the following:

- Exhibits 2-4 to Defendants' memorandum in opposition to Plaintiffs' Motions *in Limine* (Dkt. 379) containing deposition transcripts of Defendants' witnesses; and
- The redacted portions of Defendants' memorandum in opposition to Plaintiffs' Motions *in Limine* (Dkt. 379) containing references to Plaintiffs' discovery responses and to Defendants' witnesses' deposition testimony.

Defendants' Motion to Seal was filed on June 4, 2021 and memoranda in support of or in opposition to the motion must be filed within seven (7) days after the filing of Defendants' Motion to Seal, and all or part of such memoranda may be designated as confidential. Further, any person objecting to the motion must file an objection with the Clerk within seven (7) days after the filing of the Defendants' Motion to Seal and if no objection is filed in a timely manner, the Court may treat the motion as uncontested.

Date: June 4, 2021

Respectfully submitted,

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP, WAPLES PROJECT LIMITED
PARTNERSHIP AND
A. J. DWOSKIN & ASSOCIATES, INC.

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of June, 2021, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing to all counsel of record.

/s/

Grayson P. Hanes (VSB No. 06614)
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